

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Wireless Communications Association Int'l)	
Petition to Amend Section 27.53(m) of the)	RM - 11614
Commission's Rules)	
)	

Comments of Alcatel-Lucent

Alcatel-Lucent ("ALU") files Comments in the above-entitled docket to support the Wireless Communications Association's ("WCAI") petition for rulemaking, which seeks to amend Sections 27.53(m)(4) and 27.53(m)(6) of the Commission's rules that govern out-of-band-emission ("OOBE") limits for mobile digital stations in the 2.5 GHz band.

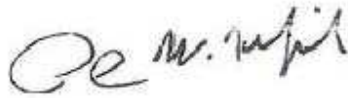
In its petition for rulemaking, the WCAI explains that the most efficient implementation of LTE and WiMAX technologies requires the use of 20 MHz (or wider) channels, and that mobile stations designed to support such wideband channels must also support a desirable, compact form factor. WCAI argues that mobile stations that provide for wide band channels and feature a compact form factor will not be able to meet the existing OOBE requirements. Further, requirements for mobile stations/user equipment (UE) established by 3GPP and described in 3GPP TS 36.101 V8.7.0 support the requested relaxed rules. The WCAI adds that the use of common requirements would support economies of scale in the manufacture of the desired UE, resulting in wider availability and reduced cost.

The WCAI's concern associated with the ability of UE to meet the current FCC OOB rules is valid. The roll-off necessary to provide the loss needed to meet the OOB requirements may indeed be difficult to achieve with UE filters that support a wideband (20 MHz) channel and are necessarily compact in size and reasonable in cost.

Alcatel-Lucent supports WCAI's request and urges the Commission to initiate a formal rulemaking relative to this matter. Without prejudicing any further position or comments in such a rulemaking, ALU agrees with WCAI on the merits of its particular OOB concerns and building a complete record through the rulemaking process would be in the public interest.

Respectfully Submitted,

Alcatel-Lucent



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